

1 CHRISTOPHER FROST (SBN 200336)  
 2 chris@frostllp.com  
 3 JOHN MAATTA (SBN 83683)  
 4 john@frostllp.com  
 5 JOSHUA STAMBAUGH (SBN 233834)  
 6 josh@frostllp.com  
 7 LAWRENCE J.H. LIU (SBN 312115)  
 8 lawrence@frostllp.com  
 9 FROST LLP  
 10 10960 Wilshire Boulevard, Suite 2100  
 11 Los Angeles, California 90024  
 12 Telephone: (424) 254-0441

13 SHAUNA A. IZADI (Admitted *Pro Hac Vice*)  
 14 sizadi@izadilegal.com  
 15 IZADI LEGAL GROUP, PLLC  
 16 13155 Noel Rd, Suite 900  
 17 Dallas, Texas 75240

18 Attorneys for Defendants Celestron Acquisition, LLC Synta  
 19 Technology Corp., Suzhou Synta Optical Technology Co.,  
 20 Ltd., Synta Canada Int'l Enterprises Ltd., SW Technology  
 21 Corp., Olivon Manufacturing Co. Ltd., Olivon USA, LLC,  
 22 Nantong Schmidt Optoelectrical Technology Co. Ltd, Pacific  
 23 Telescope Corp., Corey Lee, David Shen, Sylvia Shen, Jack  
 24 Chen, Jean Shen, Joseph Lupica, Dave Anderson, Laurence  
 25 Huen

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

18 IN RE TELESCOPES ANTITRUST LITIGATION  
 19 THIS DOCUMENT RELATES TO:

20 AURORA ASTRO PRODUCTS, LLC, PIONEER  
 21 CYCLING & FITNESS, LLP; and those similarly  
 22 situated,

23 Plaintiffs,  
 24 vs.

25 CELESTRON ACQUISITION, LLC, SUZHOU  
 26 SYNTA OPTICAL TECHNOLOGY CO., LTD.,  
 27 SYNTA CANADA INT'L ENTERPRISES LTD.,  
 28 SW TECHNOLOGY CORP., OLIVON  
 MANUFACTURING CO. LTD., OLIVON USA,  
 LLC, NANTONG SCHMIDT OPTOELECTRICAL  
 TECHNOLOGY CO. LTD., NINGBO SUNNY  
 ELECTRONIC CO., LTD., PACIFIC TELESCOPE  
 CORP., COREY LEE, DAVID SHEN, SYLVIA  
 SHEN, JACK CHEN, JEAN SHEN, JOSEPH  
 LUPICA, DAVE ANDERSON, LAURENCE  
 HUEN, and DOES 1-50,

29 Defendants.

30 Case No. 5:20-cv-03642-EJD

31 *Assigned for All Purposes to:*  
 32 *Hon. Edward J. Davila*

33 **DECLARATION OF LAWRENCE J.H.  
 34 LIU IN SUPPORT OF DEFENDANT  
 35 SYNTA CANADA INT'L ENTERPRISES  
 36 LTD.'S MOTION FOR SUMMARY  
 37 JUDGMENT, OR IN THE  
 38 ALTERNATIVE, PARTIAL SUMMARY  
 39 JUDGMENT**

40 *[Filed with Defendant Synta Canada Int'l  
 41 Enterprises Ltd.'s Motion For Summary  
 42 Judgment; Separate Statement; and Declaration  
 43 of Sylvia Shen]*

44 Hearing

45 Date: TBD  
 46 Time: TBD  
 47 Crtrm.: 4 (5th Floor)

48 Compl. Filed: June 1, 2020  
 49 Trial Setting Conference: May 8, 2025

50 Case No. 5:20-cv-03642-EJD

51 **DECLARATION OF LAWRENCE J.H. LIU IN SUPPORT OF DEFENDANT SYNTA CANADA INT'L  
 52 ENTERPRISES LTD.'S MOTION FOR SUMMARY JUDGMENT**

## DECLARATION OF LAWRENCE J.H. LIU

I, Lawrence J.H. Liu, declare as follows:

3 1. I am an attorney licensed to practice before this Court, and am Senior Counsel to the  
4 law firm of FROST LLP, attorneys of record herein for Defendants Celestron Acquisition, LLC,  
5 Synta Technology Corp., Suzhou Synta Optical Technology Co., Ltd., Synta Canada Int'l Enterprises  
6 Ltd., SW Technology Corp., Olivon Manufacturing Co. Ltd., Olivon USA, LLC, Nantong Schmidt  
7 Optoelectrical Technology Co. Ltd., Pacific Telescope Corp., Corey Lee, David Shen, Sylvia Shen,  
8 Jack Chen, Jean Shen, Joseph Lupica, Dave Anderson, Laurence Huen (collectively, "Defendants").  
9 I have personal knowledge of the facts stated herein and, if called upon to testify as a witness, I could  
10 and would competently testify thereto. I make this Declaration in support of Defendant Synta Canada  
11 Int'l Enterprises, Ltd.'s Motion for Summary Judgment, Or In The Alternative, Partial Summary  
12 Judgment, filed concurrently herewith.

13       2.       On February 28, 2025, my office met and conferred with counsel for Direct Purchaser  
14 Plaintiffs (“DPPs”) to discuss Defendants’ anticipated filing of motions for summary judgment for:  
15 (1) Corey Lee; (2) Jean Shen, Olivon Manufacturing Co. Ltd., and Olivon USA, LLC (together,  
16 “Olivon Defendants”); (3) Synta Technology Corp. (“Synta Taiwan”); (4) Synta Canada Int’l  
17 Enterprises Ltd. (“Synta Canada”); (5) SW Technology Corp. (“SW Technology”); (6) Pacific  
18 Telescope Corp. (“Pacific Telescope”); (7) Celestron Acquisition, LLC (“Celestron”); (8) Joe Lupica;  
19 and (9) Dave Anderson. Defendants explained the factual and legal grounds for each motion and  
20 invited DPPs to further meet and confer on how to potentially resolve any of the motions informally.  
21 The parties, however, were not able to resolve these motions before the Court’s dispositive motion  
22 deadline, thereby necessitating the filing of these motions.

23       3.       Attached hereto as Exhibit A are true and correct copies of excerpts taken from the  
24 transcript of Sylvia Shen's deposition in this case, volume I, dated March 4, 2024

25       4. Attached hereto as **Exhibit B** are true and correct copies of excerpts taken from the  
26 transcript of Sylvia Shen's deposition in this case, volume II, dated March 5, 2024.

27 5. Attached hereto as **Exhibit C** are true and correct copies of excerpts taken from the  
28 transcript of Sylvia Shen's deposition taken in her 30(b)(6) capacity on behalf of Synta Canada and

SW Technology in this case, dated March 27, 2024.

6. Attached hereto as **Exhibit D** are true and correct copies of excerpts taken from the transcript of David Shen's deposition in this case, volume II, dated September 22, 2023.

7. Attached hereto as Exhibit E are true and correct copies of excerpts taken from the transcript of Laurence Huen's deposition in this case, volume I, dated November 9, 2023.

8. Attached hereto as Exhibit F are true and correct copies of excerpts taken from the transcript of Paul Roth's deposition in this case, volume I, dated August 7, 2023.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 7<sup>th</sup> day of March, 2025, at Los Angeles, California.



---

Lawrence J.H. Liu